

BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division INDUSTRIAL HYGIENE GROUP Standard Operating Procedure: Program Procedure	NUMBER IH50700
	REVISION Final Rev. 0
SUBJECT: Industrial Hygiene Requirements Management	DATE 07/19/04
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1.0 Purpose & Scope

This document describes the program the SHSD Industrial Hygiene Group uses to track changes in legal requirements to ensure that BNL and SHSD Industrial Hygiene Group policies and documents remain in compliance with applicable requirements. The program is also intended to identify new requirements or changes at the proposal level before they are implemented, so that the Laboratory can plan for potential impacts. This procedure supplements the Laboratory's *Requirements Management System* described in SBMS.

The scope of this procedure applies to requirements (drivers) found in:

- DOE regulations, Orders, Notices, and Guides
- OSHA worker health and safety regulations,
- DOE mandated ANSI standards,
- ANSI standards incorporated by reference in OSHA regulations,
- ANSI standards used by BNL as best management practices,
- DOE mandated ACGIH *Threshold Limit Values*®,
- DHHS Etiological Agent requirements,
- EPA Asbestos and Community R-T-K regulations,
- Suffolk County Department of Health sanitation standards, and

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- Other applicable drivers as appropriate.

2.0 Responsibilities

This procedure is administered through the SHSD Industrial Hygiene Group.

2.1 The IH Group Leader is responsible to:

- Create, lead and sustain a compliant program.
- Assess the IH Group's progress on the program.
- Assign IH staff to conduct operations covered by this program.
- Ensure that IH Staff follow the policies of this program.

2.2 The IH Group Subject Matter Experts, SBMS Subject Area Point of Contacts, and IH Program Administrators (SMEs) are responsible to:

- Maintain up to date information regarding changes to regulations.
- Review proposed changes to regulations and assess potential impacts to Laboratory management and Departments/Divisions.
- Apprise the Laboratory management and Departments/Divisions of the impact of requirement changes.
- Complete the notifications and documentation as required by the Requirements Management Subject Area.
- Initiate changes in Subject Areas as necessary.
- Incorporate changes and additions into SHSD IHG level procedures.

3.0 Definitions

3.1 **External Requirements Document:** Any federal, state, or local law or regulation; DOE Directive; or other document that imposes requirements upon the Laboratory. An example is an OSHA regulation. Other documents include Executive Orders and the BSA Prime Contract.

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3.2 **Record of Decision (ROD):** The documentation that illustrates how an external requirement document is being implemented at the Laboratory (described in the SBMS requirements management process).

3.3 **Subject Matter Expert (SME):** For this SOP, the title SME refers to the roles of SBMS Subject Area Subject Matter Expert, SBMS Point of Contact (POC) and IH Group Program Administrator. The SME is the individual assigned prime responsibility for maintaining expertise in one or more Industrial Hygiene topical areas.

4.0 **Prerequisites** none

5.0 **Precautions** none

6.0 **Procedure**

6.1 Equipment: none

6.2 SME periodically reviews the internet, governmental agency websites, and other resources (including personal contacts), for proposed or enacted changes to applicable drivers. The policy of the IH Group is to review the appropriate sources at least annually (see IH50600 and IH50610). At a minimum, the SME accesses the applicable web site(s) of the sources listed in Attachment 9.1 and verifies that the BNL documentation is based on current drivers and requirements. SMEs can also keep apprised of pending legislation through workgroups, listservs, federal and state register publications.

6.3 SME notifies the SBMS Office of any pending requirement changes that could potentially affect Laboratory operations. When a regulatory driver changes, the SME reviews the requirement for impact on BNL operations. The SME documents this review using the *External Requirements Document Record of Decision Form* found on the SBMS site at <https://sbms.bnl.gov/standard/02/0201e011.doc>.

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NOTE: The SBMS Office may notify the appropriate Management System Steward of the pending or proposed regulatory changes or new requirements that may impact Laboratory operations. The Management System Steward forwards the requirement to the SME for review.

- 6.4 The SME initiates changes in Subject Areas if needed so that the Laboratory achieves compliance with the new or changed requirements.
- 6.5 The SME initiates a general laboratory distribution notifying key Dept./Div. staff, such as ESH Coordinators if requirement changes impact Laboratory operations as a whole. SME provides technical assistance to the line organization in the implementation of any new regulatory requirements and/or interpretation of the requirements as they pertain to the line. If line management is required to implement corrective action(s), the SME identifies the responsibility to the line organization(s). Corrective Actions needed by organizations outside of SHSD are entered into the BNL ATS or SHSD FATS. An example of this action would be the collection of information for a site-wide inventory.
- 6.6 The SME makes any necessary changes to SHSD IHG level programs or activities. When significant changes have been made to IHG level documentation, a summary of the corrective actions is submitted to the SBMS Office using the *External Requirements Document Record of Decision Form*. The SME tracks IH Group corrective actions if needed. The SME notifies SHSD IH Service delivery personnel if SHSD level documentation or procedures have been changed.
- 6.7 SME sends a copy of all documents generated as a result of this procedure, including *External Requirements Document Record of Decision Form* (ROD), to the SBMS Office to serve as the “official” record. The SME maintains copies in the Program Administrator section of the Industrial Hygiene Group Leader’s files.
- 6.8 Regardless of requirement changes, SMEs review their SBMS documents on a three year cycle and revise as necessary.

7.0 Implementation and Training

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- 7.1 **Qualification Criteria:** The IH Group Leader will instruct all IH staff in their role relative to this procedure. Qualification is documented using Attachment 9.2. Re-qualification is required on a three year basis.

8.0 References

- 8.1 BNL SBMS Requirements Management Subject Area
- 8.2 BNL SBMS Laboratory-Wide Procedures and Guidelines Subject Area
- 8.3 BNL SBMS Internal Controlled Documents Subject Area

9.0 Attachments

- 9.1 Attachment 9.1: SHSD Industrial Hygiene Group- Regulatory Driver List
- 9.2 Attachment 9.2: SHSD Industrial Hygiene Group- Qualification form.

10.0 Documentation

Document Review Tracking Sheet		
<p>PREPARED BY:</p> <p><i>(signature and date on file)</i></p> <p>R. Selvey Date 07/16/04</p>	<p>REVIEWED BY:</p> <p><i>(signature and date on file)</i></p> <p>J. Peters Date 07/19/04</p>	<p>APPROVED BY:</p> <p><i>(signature and date on file)</i></p> <p>R. Selvey IH Manager Date 07/20/04</p>
<p>Filing Code:</p> <p>IH50QR.04</p>	<p>DQAR</p> <p>Date</p>	<p>Effective Date:</p> <p align="center">07/20/04</p>

The only official copy is on-line at the SHSD IH Group website.
Before using a printed copy, verify that it is current by checking the document issue date on the website.

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Attachment 1:

Industrial Hygiene Regulatory Drivers

Document	Title
10 CFR 850	Chronic Beryllium Disease Prevention Program
29 CFR 1910	Labor/Occupational Safety and Health Standards
29 CFR 1926	Labor/Safety and Health Regulations for Construction
40 CFR 370	Protection of the Environment/Hazardous Chemical Reporting: Community Right-to-Know
40 CFR 61 - Subpart A	National Emissions Standards for Hazardous Air Pollutants (NESHAPS)
40 CFR 763	Protection of the Environment/Asbestos
42 CFR 72	Interstate Shipment of Etiologic Agents
5480.4 Change 3	Industrial Hygiene Protection, Safety and Health Protection Standards
ACGIH TLVs	Threshold Limit Values for Chemical Substances and Physical Agents
ANSI C95-1-1992	Safety Levels with Respect to Human Exposure to Radiofrequency Electromagnetic Fields RF (200kHz - 100Ghz)
ANSI Z 136.1	Safe Use of Lasers
ANSI Z 4.1-68	Requirements for Sanitation
ANSI Z 88.2	Respiratory Protection
ANSI/ASHRAE Std 62-1989R	Ventilation for Acceptable Indoor Air Quality
M 231.1-1 Change 2	Environment, Safety and Health Reporting Manual
N 450.12	Extension of Notice 450.7

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N 450.7	CRD - The Safe Handling, Transfer, and Receipt of Biological Etiological Agents at Department of Energy Facilities
O 440.1A	CRD - Worker Protection Management for DOE Contractor Employees
OSHA Instruction CPL 2-2.20B	Chapter 5, Back Disorders and Injuries
SCSC	Suffolk County Sanitation Code

IH Program Administration IH Requirements Management



Job Performance Measure (JPM) Completion Certificate

Candidate's Name	Life Number:
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Practical Skill Evaluation: Demonstration of Evaluation Methodology by Oral Exam

Criteria	Qualifying Performance Standard	Unsat.	Recov.	Satisf.
Finding Requirement Changes	Demonstrates knowledge in how to periodically review appropriate sources: internet, governmental agency websites, and other resources (including personal contacts), workgroups, listservs, federal and state register publications.			
BNL Change Management Process	Demonstrates knowledge of the SBMS Office process for conducting requirement changes.			
BNL Level Documentation	Demonstrates knowledge in initiating and leading change in Subject Areas if needed.			
Site-wide Action	Demonstrates knowledge in initiating and leading general laboratory distribution of notifications of changes. Understands the process of getting entries entered into the BNL ATS or SHSD FATS.			
IH Group level policy and procedures	Demonstrates knowledge in making any necessary changes to SHSD IHG level programs or activities.			
Record keeping	Demonstrates knowledge in documenting corrective actions submitted to the SBMS Office using the <i>External Requirements Document Record of Decision Form</i> . Understands the need to send a copy of all documents generated as a result of this procedure to SBMS. Understands need to and where to maintain copies in the Program Administrator section of the Industrial Hygiene Group Leader's files.			

I accept the responsibility for performing this task as demonstrated within this JPM and the corresponding SOP.

Candidate Signature:	Date:
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I certify the candidate has satisfactorily performed each of the above listed steps and is capable of performing the task unsupervised.

Evaluator Signature:	Date:
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